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UNITED STATES DISTRICT COURT

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NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

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13   CHASOM BROWN, WILLIAM BYATT,
      JEREMY DAVIS, CHRISTOPHER
14   CASTILLO, and MONIQUE TRUJILLO,
      individually and on behalf of all similarly
15   situated,

16   Plaintiffs,

17   v.

18   GOOGLE LLC,

19   Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**[PROPOSED]   ORDER   GRANTING
MOTION TO SEAL**

Judge: Hon. Susan van Keulen, USMJ

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[PROPOSED] ORDER

2   Before the Court is Plaintiffs' Administrative Motion to Consider Whether Google's

3 Materials Should Be Sealed regarding Plaintiffs' Response in Opposition to Google' Motion for

4 Relief Regarding Preservation (Dkt. 799) ("Motion").   Having considered the Motion and

5 supporting declarations, and good cause having been found, the Court **ORDERS** as follows:

Document	Court's Ruling on Motion to Seal	Reason(s) for Court's Ruling
Plaintiffs' Response in Opposition to Google' Motion for Relief Regarding Preservation	GRANTED as to redacted portions at: Pages 1:2-3, 1:5, 1:9-10, 1:12, 1:16, 2:7-9, 4:2-3, 4:6, 4:8, 4:10, 4:12, 4:17-22, 5:5, 5:7, 5:10, 5:12-14, 5:17-25, 6:1-2, 6:4-5, 6:7-8, 6:13, 6:15, 6:17-18, 6:25, 7:21, 8:1, 8:3-4, 8:6, 8:16, 8:18. 9:15, 10:2, 10:7, 10:9, 10:11, 10:13, 10:15-16, 11:26, 13:2	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, internal project code names, data signals, and logs, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. *See* Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
Exhibit 1 to McGee Declaration Liao Depo. Trans. Excerpts	GRANTED as to redacted portions at:	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations,

	Pages 22:1-2, 22:10, 22:12-18, 22:24-23:1, 23:3, 23:9, 23:16-17, 23:19, 24:1, 24:4-7, 24:13, 25:20, 25:22, 26:3, 26:16, 26:18, 26:20, 27:7, 27:11, 27:13, 27:20, 27:23, 28:6, 28:18, 28:20, 28:22, 29:6-7, 29:9, 29:11-12, 29:15, 30:13-14, 30:17, 30:21-22, 31:3-4, 31:11-14, 31:19, 31:22, 32:2, 32:7, 32:13, 33:3, 33:7, 33:14, 33:16, 33:20, 33:24, 34:1, 34:6, 34:9-12, 34:15, 34:22-23, 35:9, 35:14, 35:19, 36:2, 36:4, 36:10	including various types of Google's internal projects, internal project code names, data signals, and logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. *See* Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
Exhibit 2 to McGee Declaration GFS Field Names	GRANTED as to redacted portions at: Sealed Entirely	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including Google's internal data logging systems and fields, as well as their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. *See* Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and

		practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
Exhibit 3 to McGee Declaration GA Field Names	GRANTED as to redacted portions at: Sealed Entirely	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including Google's internal data logging systems and fields, as well as their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. *See* Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.

SO ORDERED.

DATED: _____   _____
                                        HON. SUSAN VAN KEULEN
                                        United States Magistrate Judge

Case No. 4:20-cv-03664-YGR-SVK
[PROPOSED] ORDER GRANTING MOTION TO SEAL